FINAL STAFF EVALUATION FOR ENVIRONMENTAL CHECKLIST SEP17-00001

Date: 3 January 2017, updated 3 February 2017

Project Name: 9th Major Amendment to Issaquah Highlands Development Agreement: Westridge Transfer of Development Rights (TDRs)

Applicant: Richard Rawlings (425) 586-7700
Polygon Northwest
1624 SE 5th Street, Suite 200
Bellevue, WA 98005

Location: Issaquah Highlands Area 4

Legal Description: (See Environmental Checklist)

S-T-R: 27-24-06
Principal Parcel #: 272406-9209

Parcel Size: 26.9 acres (1,170,134 square feet)

Proposal: Add 100 residential units to Issaquah Highlands to be incorporated into residential development of the Westridge neighborhood of Issaquah Highlands.

Existing Zoning: Urban Village
Proposed Zoning: (Not Applicable)
Comprehensive Plan Designation: Urban Village

A. BACKGROUND:

Pursuant to WAC 197-11-340(2), the City of Issaquah is required to send any DNS which may result from this environmental review, along with the checklist, to DOE, the US Army Corps of Engineers, other agencies with jurisdiction, affected tribes and interested parties. Therefore, the City will not act on this proposal for 21 days after the DNS issuance.

Phasing
The proposed 100 TDRs would be incorporated into the buildout of the Westridge neighborhood. Although this neighborhood will be comprised of a number of development applications, it is not expected to occur in phases. All permitting is expected in 2017.

Environmental Information
Other environmental information, which has been prepared for the site, includes an environmental impact statement (Grand Ridge EIS). The EIS evaluated earthwork, transportation, removal of vegetation and natural habitat, archaeology, water, air and views.

The following information was prepared in support of the current checklist application and is incorporated by reference. These documents are available for review at the Planning and Community Development Department during regular business hours.

SEPA Checklist, dated 25 October 2016

Polygon Westridge Residential Traffic Operations Analysis, Transpo Group, 29 December 2016.

Public Comment
The City received Public Comment on this application on 5 January 2017 from Ms. Connie Marsh and Ms. Kim Collette on 5 January 2017. Comments from Ms. Marsh related to the traffic analysis and a perceived adverse impact related to a lack of recreational amenities. Comments from Ms. Collette shared a disapproval for allowing more housing into Issaquah Highlands.

Additional Approvals
An Agenda Bill (7215 – 9th major Amendment to the Issaquah Highlands Development Agreement) was initiated in support of this request. The Agenda Bill will be decided by the City Council and is necessary to incorporate the 100 TDRs into Issaquah Highlands. In addition to the Major Amendment, the applicant will be required to attain land use permits, site work permits and building permits to actualize the 100 TDRs.

B. ENVIRONMENTAL ELEMENTS:

1. Earth:
The US Department of Agriculture Soil Conservation Service's "Soil Survey for the King County Area, Washington", classifies the site's underlying soil as:

NeC—Neilton very gravelly loamy sand, 2 to 15 percent slopes

Map Unit Setting

- *National map unit symbol:* 1hmtg
- *Elevation:* 160 to 920 feet
- *Mean annual precipitation:* 30 to 55 inches
- *Mean annual air temperature:* 50 degrees F
- *Frost-free period:* 145 to 210 days
- *Farmland classification:* Not prime farmland

Map Unit Composition

- *Neilton and similar soils:* 98 percent
- *Minor components:* 2 percent
- *Estimates are based on observations, descriptions, and transects of the mapunit.*

Description of Neilton

Setting

- *Landform:* Terraces
- *Parent material:* Glacial outwash

Typical profile

- *H1 - 0 to 6 inches:* very gravelly loamy sand
- *H2 - 6 to 18 inches:* very gravelly loamy sand
- *H3 - 18 to 60 inches:* very gravelly sand

Properties and qualities

- *Slope:* 2 to 15 percent
- *Depth to restrictive feature:* More than 80 inches
- *Natural drainage class:* Excessively drained
- *Capacity of the most limiting layer to transmit water (Ksat):* High to very high (5.95 to 19.98 in/hr)
- *Depth to water table:* More than 80 inches
- *Frequency of flooding:* None
- *Frequency of ponding:* None
- *Available water storage in profile:* Very low (about 2.0 inches)

Interpretive groups

- *Land capability classification (irrigated):* None specified
- *Land capability classification (nonirrigated):* 6s
- *Hydrologic Soil Group:* A
- *Other vegetative classification:* Droughty Soils (G002XN402WA)
- *Hydric soil rating:* No

Minor Components

Norma

- *Percent of map unit:* 1 percent
- *Landform:* Depressions
- *Hydric soil rating:* Yes

Seattle

- *Percent of map unit:* 1 percent
- *Landform:* Depressions
- *Hydric soil rating:* Yes

The site has been previously used as a quarry site and has been mined and graded.

While the site's soils are not inherently susceptible to erosion, the proposed development will require grading and excavation activities across 100% of the property combined with the importation and distribution of fill material to make final site grades and to achieve proper slopes for drainage. Loose soil, disrupted during site construction activities, creates the potential for erosion and soil displacement. Without proper erosion and sedimentation control measures in place prior to the commencement of construction activities, there is a potential for adverse impacts to occur on earth resources. Appropriate measures shall be taken to ensure that construction operations do not result in erosion and sedimentation impacts on water quality and on nearby drainage courses. At a minimum, erosion control measures should include the installation of temporary and permanent erosion control improvements, and appropriate stabilization of filled and graded areas which are not immediately developed.

2. Air:
Air pollution is the presence of air-borne residuals such as dust, fumes, and smoke at levels causing injury to life and/or property. Air quality is regulated by the Environmental Protection Agency, Washington Department of Ecology, the Puget Sound Air Pollution Control Agency and through local policy direction.

Short-term impacts on air quality will occur during construction, site clearance and paving operations. Construction activity will contribute to the short-term increase in local particulate levels. Construction activity will also contribute to increased carbon monoxide levels resulting from the operation of construction machinery and construction vehicle access to the site. Minimizing the increased levels of suspended particulates is a priority for the City. The City will consider mitigation measures that will keep the levels of on-site dust emissions at an acceptable level.

Longer-term impacts due to vehicle emissions and the release of emissions from building equipment will vary in level according to the amount of traffic generated in the future, and from the specific operations of the buildings. It is anticipated that the project will contribute to the cumulative effects of increased air pollution through an increase in vehicular trips to the area, but the added trips from 100 additional residential units will not result in a significant adverse environmental impact.

3. Water:
The project site and surrounding environs do not contain any surface water bodies or known wetlands.

Quantity
With the addition of the 100 buildings and paved areas, the storm water runoff from the property will be increased. The checklist response indicated that approximately 75% of the site will be covered with

impervious material. The project's on-site storm drainage system must be designed and constructed in accordance with City requirements with supporting analysis. This will be evaluated with land use pits for the property.

Quality
Construction activities combined with the addition of impervious surfaces create the potential for water quality degradation. As with all paved, developed areas, this site will contribute some pollutants to ground and surface waters as the pollutants are washed off impervious surfaces into the storm drainage system. Pollutants which accumulate on paved surfaces include heavy metals, petrochemicals, and other potentially-harmful substances. Runoff from parking and access drives will be collected, detained and receive water quality treatment via a City-approved treatment method prior to discharge off site to the City storm drainage system.

Proper and routine maintenance of the site's private storm drainage facilities is necessary to avoid adverse impacts and to ensure sufficient storage capacity and water quality treatment. The City will consider measures to ensure proper design, construction and maintenance of the proposed storm drainage facilities.

4. Plants:
The site has been used as a quarry site in the past and all vegetation has been removed. The incorporation of 100 additional residential units to this property will not result in additional impacts.

5. Animals:
The site has been used as a quarry site in the past and all vegetation has been removed. The incorporation of 100 additional residential units to this property will not result in additional impacts.

6. Energy and Natural Resources: Concur with checklist.

7. Environmental Health: Concur with Checklist

8. Land and Shoreline Use:
The site is designated for Urban Village development by the Comprehensive Plan and is zoned UV, Urban Village. The existing land uses are as follows:

On-site: vacant, undeveloped
West: single-family residential
East: vacant, commercial and retail
North: vacant, Lakeside Urban Village, across High Street
South: across Discovery Drive, residential, vacant, and hospital

Per the Issaquah Highlands' Development Agreement, Residential uses are already allowed in the Westridge area of Issaquah Highlands. The residential density range in Development Area 4 is from a minimum of 5 dwelling units per acre (du/ac) to a maximum of 80 du/ac. Without the TDRs, the slightly less than 40 acres of Polygon property would be developed at almost 7 du/ac. Incorporation of the TDRs would increase the property density to approximately 9 units per acre.

In comparing the proposed use with the City's Comprehensive Plan designation and Zoning Ordinance District, the proposed action is consistent with the City's adopted plans.

9. Housing:

The incorporation of 100 housing units will include new affordable housing added to Issaquah Highlands. The number and location for those units will be determined by the City Council with the approval of the 9th Major Amendment.

10. Aesthetics:
A visual impact assessment was prepared for the Grand Ridge EIS. The building heights for this property are 85 feet. With the incorporation of the TDRs, at 9 units per acre, the views of the property will not be perceptibly different than if it were developed at 7 units/acre.

11. Light and Glare:
Incorporation of 100 additional residential units into Issaquah Highlands will add to the light and glare impacts of the development. Lighting impacts should be considered for streets and public areas. Lighting should be low and shielded to minimize glare and light spill impacts.

12. Recreation:
The addition of 100 housing units will add approximately 250 new residents to this area. Although the TDRs will pay Park Impact Fees, on-site recreational opportunities are needed. This obligation will be considered as part of the Land Use permits for this property.

13. Historic and Cultural Preservation:
Since the site has been previously quarried and graded, there exists a fairly low potential for historic or cultural remnants to be located on the site.

14. Transportation:
Short-term impacts on transportation will occur during the site preparation and construction activities. Longer-term impacts to the transportation system will vary in level according to the amount of traffic generated by the development of the site.

The inclusion of 100 additional residential units will increase the number of vehicle trips. This impact was evaluated by the applicant as part of the Checklist.

The development of this property will create new vehicular trips in this vicinity. A traffic study was prepared for this parcel by Transpo Group on 29 December 2016. The purpose of this study was to evaluate existing traffic conditions, the addition of traffic based on the proposed development and identify impacts resulting from this addition of traffic.

The analysis of buildout conditions included a total of 365 dwelling units (inclusive of the 182 initial dwelling units and the 100 TDR units) and buildout of the roadway network. Under buildout, the 365 dwelling units could generate up to 208 trips during the weekday AM peak hour (45 in / 163 out) and 264 trips during the weekday PM peak hour (171 in / 93 out). All assumptions from the March 2013 analysis, including buildout3 of the West 45 area, remained the same for this buildout analysis. The results of the analysis of demonstrated that all performance criteria would be met under buildout conditions and remain similar to March 2013 results (last traffic evaluation performed for Swedish).

Additional modeling will be required prior to approval of any Land Use Permit utilizing the additional 100 units. The modeling (with or without proposed mitigations) must meet the following criteria:

1. The model run shall be based on the traffic model from the approved Traffic Operations Analysis Report for Issaquah Highlands; and,

2. The "background" trips in the current model shall be superseded with "actual" trips based on AM and PM traffic counts conducted within the last 6 months of the date of the model run and use existing land uses and currently-planned land uses within Issaquah Highlands; and,

3. The transportation system shall be defined as "acceptable" if it meets all of the following criteria:

    a. Complies with the travel-time requirement in the Microsoft Traffic covenant; and,

    b. Complies with LOS D at each intersection movement within the Issaquah Highlands Couplet with or without modifications; and,

    c. Complies with LOS D at each intersection movement within the Couplet with roadway modifications as long as those modifications can be completed within the existing Right of Way and the improvements are unambiguously described in the traffic analysis.

15. Public Services:
The incorporation of 100 TDRs will require normal police and fire protection associated with this type of use. The applicant will pay Fire & Police Impact Fees for the TDRs.

16. Utilities:
All proposed utilities are available in the vicinity.

C. CONCLUSION:

Based on this analysis, the proposal can be found to not have a probable, significant adverse impact on the environment. The City reserves the right to review any future revisions or alterations to the site or to the proposal in order to determine the environmental significance or non-significance of the project at that point in time.

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